

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERNESTINE BROWN,)	
)	
Plaintiff,)	
)	
v.)	No. 07 C 6634
)	
WILL COUNTY SHERIFF DEPARTMENT and)	
WILL COUNTY SHERIFF PAUL J. KAUPAS,)	Judge Aspen
in his official capacity, Unknown WILL)	
COUNTY ADULT DETENTION FACILITY)	
HEALTH CARE PROVIDERS, and Unknown)	
WILL COUNTY ADULT DETENTION)	
FACILITY CORRECTIONAL OFFICERS,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY

NOW COMES both Plaintiff, Ernestine Brown, by and through her attorneys, Law Office of John Bishof, PC, and Defendants, and Will County Sheriff Department, Will County Sheriff Paul J. Kaupas, and in his official capacity, by their attorneys, Querrey & Harrow, appointed as Special State's Attorney and hereby move this Court for an extension of time to complete discovery. In support of their motion, the parties state as follows:

1. Plaintiff brings this claim, among other state law claims, pursuant to 42 U.S.C. §1983. This action was filed on November 26, 2007.
2. On April 10, 2008, this Court entered an order setting the close of all discovery for August 15, 2008. During that time, the parties exchanged written discovery. Both parties answered interrogatories and produced documents. Depositions have been noticed up but are not yet complete.

3. The parties' discovery efforts have been hampered by a delay in obtaining the plaintiff's medical records for her medical providers in Decatur, Illinois. Plaintiff's medical records show that she has a long history of illness and treated by numerous medical providers over the years

4. Plaintiff currently resides in Decatur, Illinois. She does not operate a vehicle and relies on family members for transportation. Plaintiff's deposition was scheduled for July 29, 2008. The day before, plaintiff advised that she would be able to attend but due to car problems was not able to appear.

5. The parties respectfully request an additional sixty (60) days to complete fact discovery and an additional sixty days (60) to complete depositions of plaintiff's medical providers.

6. This motion is not brought for purposes of delay and will not prejudice either party.

WHEREFORE, Plaintiff, Ernestine Brown, and Defendants, Will County Sheriff Department, and Will County Sheriff Paul J. Kaupas respectfully request that this Court grant the parties until December 12, 2008, to complete discovery, or for such other relief as this Court deems just.

Dated: August 14, 2008

ERNESTINE BROWN, Plaintiff

/s/ John S. Bishof, Jr.
John S. Bishof, Jr.
jsbishof@yahoo.com

Respectfully submitted,

WILL COUNTY SHERIFF
DEPARTMENT, and WILL COUNTY
SHERIFF PAUL J. KAUPAS, Defendants

/s/ Dominick L. Lanzito (by permission)
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